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19 **UNITED STATES DISTRICT COURT**  
20 **NORTHERN DISTRICT OF CALIFORNIA**  
21 **SAN FRANCISCO DIVISION**

22 RICHARD KADREY, *et al.*,  
23 Individual and Representative Plaintiffs,  
24 v.  
25 META PLATFORMS, INC., a Delaware  
26 corporation;  
27 Defendant.  
28

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF JUDD LAUTER**

1 I, Judd Lauter, declare:

2 1. I am a Special Counsel at the law firm of Cooley LLP and counsel to Meta Platforms,  
3 Inc. in the above-referenced matter. I have personal knowledge of the facts contained in this  
4 Declaration and, if called as a witness, could competently testify to them under oath.

5 2. Attached hereto as Exhibit A is a true and correct copy of relevant excerpts from the  
6 transcript of the deposition of Todor Mihaylov.

7 3. Attached hereto as Exhibit B is a true and correct copy of Plaintiffs' Amended  
8 30(b)(6) Notice, dated October 8, 2024.

9 I declare under penalty of perjury that the foregoing is true and correct. Executed on this  
10 11<sup>th</sup> day of October at Melrude, MN.

11  
12 /Judd Lauter/

13 Judd Lauter  
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